

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
Philadelphia Division**

Yesica Paola Delvalle,

Debtor.

Case No. 24-12464-AMC
Chapter 13

Motion to Extend the Automatic Stay

Debtor Yesica Paola Delvalle, through their attorney, moves this Court as follows:

1. The Debtor filed a bankruptcy petition on July 17, 2024. They have filed a plan and all schedules, statements, and other documents required by 11 U.S.C. §521(a)(1) and Fed. R. Bankr. P. 1007(b).

2. The Debtor was involved in one active bankruptcy between July 18, 2023, and July 17, 2024:

Case No.	District	Filed	Dismissed	Reason
20-14252	PAEB	10/27/2020	12/14/2023	Failure to make plan payments

3. Because the Debtor was involved in only one active bankruptcy between July 18, 2023, and July 17, 2024, the automatic stay is set to expire on August 9, 2024. 11 U.S.C. § 362(c)(3)(A).

4. The Court may extend the automatic stay when a case is filed in good faith as to the creditors to be stayed. Good faith means that there are new circumstances demonstrating that the Debtor can probably reach the end of a chapter 13 plan. *In re Legree*, 285 B.R. 615, 620 (Bankr. E.D. Pa. 2002).

5. This case was filed in good faith. The debtor's income has risen since the filing of the prior bankruptcy case.

6. Because this case was filed in good faith, the Court must continue the automatic stay against all creditors until the Debtor receive a discharge.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: August 1, 2024

CIBIK LAW, P.C.
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